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Attorneys for Defendant
Greater Palm Springs Tourism
Foundation dba Greater Palm Springs
Convention and Visitors Bureau

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

LISA CORSON,

Plaintiff,

vs.

GREATER PALM SPRINGS
TOURISM FOUNDATION DBA
GREATER PALM SPRINGS
CONVENTION AND VISITORS
BUREAU,

Defendant.

Case No.: 5:22-cv-00736-SPG-PVC

**SECOND STIPULATION TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE A MOTION
TO STRIKE DEFENDANT’S
AFFIRMATIVE DEFENSES**

Current Date: August 15, 2022
Proposed Date: August 29, 2022

Judge: Hon. Sherilyn Peace Garnett

Plaintiff LISA CORSON (“Corson”) and Defendant GREATER PALM SPRINGS TOURISM FOUNDATION DBA GREATER PALM SPRINGS CONVENTION AND VISITORS BUREAU (“GPSTF”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, Corson filed her Complaint on April 28, 2022 at ECF 1;

1 WHEREAS, GPSTF filed its Answer on June 23, 2022 at ECF 25;
2 WHEREAS, Plaintiff's motion to strike affirmative defenses deadline
3 would be July 14, 2022;

4 WHEREAS, GPSTF's Answer to Corson's Complaint contains ten (10)
5 Affirmative Defenses;

6 WHEREAS, the Parties had previously requested a thirty (30) day
7 extension to file a motion to strike Defendant's affirmative defenses (ECF 28);

8 WHEREAS, the Court granted the Parties first extension (ECF 29);

9 WHEREAS, GPSTF previously submitted this matter to insurance and it
10 was unknown whether Defendant's counsel was going to remain on the matter;

11 WHEREAS, GPSTF's insurance carrier will not be taking the claim and
12 Defendant's counsel will remain counsel;

13 WHEREAS, Parties are actively engaged in early settlement negotiations
14 and request an additional fourteen (14) days for Corson to file a motion to strike
15 Defendant's affirmative defenses;

16 WHEREAS, good cause exists for this second extension because the
17 parties hope to resolve the matter without engaging in motion practice and
18 wasting the Court's resources;

19 WHEREAS, this request is not made for delay;

20 WHEREAS, this will not delay or have any effect on the schedule in this
21 case; and

22 WHEREAS, this is the parties second request for an extension of time
23 regarding the affirmative defenses;

24 IT IS HEREBY STIPULATED that Plaintiff's deadline to file a motion
25 to strike affirmative defenses is hereby continued from August 15, 2022 to
26 August 29, 2022.

27
28 DATED: August 12, 2022

Respectfully submitted,

1
2 /s/ Matthew L. Rollin

3 JONAH A. GROSSBARDT

4 MATTHEW L. ROLLIN

5 **SRIPLAW**

6 Attorneys for Plaintiff Lisa Corson

/s/ Shaun M. Murphy

SHAUN M. MURPHY

Attorneys for Defendant Greater Palm
Springs Tourism Foundation dba

Greater Palm Springs Convention and
Visitors Bureau

7
8 **ATTESTATION**

9 Pursuant to Local Rule 5.4.3.4(2)(i), all signatories listed, and on whose
10 behalf this filing is submitted, concur in the filing's content and have authorized
11 the filing.

12 /s/ Matthew L. Rollin

13 MATTHEW L. ROLLIN